

Brooklyn ^(BDS) Defenders

Brooklyn Defender Services
177 Livingston St., 7th Fl.
Brooklyn, NY 11201

December 1, 2022

VIA ECF

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

*So ordered
12-1-22
Alvin K. Hellerstein*

**Re: *Lopez Cano v. Decker*, No. 22-cv-07428
Motion to File Under Seal**

Dear Judge Hellerstein:

This office represents the Petitioner, Michael Lopez Cano, in the above-captioned matter. We write to respectfully request permission to file Petitioner's Psychological Evaluation (ECF No. 11-1) and Petitioner's Medical Records from Orange County Jail (ECF No. 11-2) under seal. Petitioner's evaluation and medical records contain sensitive medical information, including medical information about self-harm and childhood trauma.¹

Pursuant to the Court's Individual Rules, Petitioner has filed redacted versions of both documents on ECF and will submit unredacted versions to the Court via email.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/

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¹ Courts in this District have permitted the sealing of medical records, even if specific details relating to a health record appear on the record. *See, e.g., United States v. Needham*, 460 F. Supp. 3d 323, 324 n.1 (S.D.N.Y. 2020); *United States v. Estevez*, No. 18 Cr. 669 (JPO), 2020 WL 1911207, at *1 (S.D.N.Y. Apr. 20, 2020); *United States v. Ebberts*, 432 F. Supp. 3d 421, 423 n.1 (S.D.N.Y. 2020).